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**Additional counsel listed on signature page*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

John Doe,

Plaintiff,

v.

Donald J. TRUMP, in his official capacity,
President of the United States of America, et al.

Defendants.

Case No. 4:25-cv-03140-JSW

**NOTICE OF ADDITIONAL
EVIDENCE;
AUTHENTICATING
DECLARATION OF JOHNNY
SINODIS**

Judge: Hon. Jeffrey White
Hearing Date: Aug. 22, 2025
Hearing Time: 9:00 a.m.

Zhuoer Chen, et al.,

Plaintiffs,

v.

Kristi NOEM, in her official capacity,
Secretary of the U.S. Department of Homeland
Security, et al.

Defendants.

Case No. 4:25-cv-03292-JSW

**NOTICE OF ADDITIONAL
EVIDENCE;
AUTHENTICATING
DECLARATION OF JOHNNY
SINODIS**

Judge: Hon. Jeffrey White
Hearing Date: Aug. 22, 2025
Hearing Time: 9:00 a.m.

1 S.Y., et al.,

2 Plaintiffs,

3 v.

4 Kristi NOEM, in her official capacity,
5 Secretary of the U.S. Department of Homeland
6 Security, et al.

7 Defendants.

Case No. 4:25-cv-03244-JSW

**NOTICE OF ADDITIONAL
EVIDENCE;
AUTHENTICATING
DECLARATION OF JOHNNY
SINODIS**

Judge: Hon. Jeffrey White
Hearing Date: Aug. 22, 2025
Hearing Time: 9:00 a.m.

9
10 J.C., et al.,

11 Plaintiffs,

12 v.

13 Kristi NOEM, in her official capacity,
14 Secretary of the U.S. Department of Homeland
15 Security, et al.

16 Defendants.

Case No. 4:25-cv-03502-JSW

**NOTICE OF ADDITIONAL
EVIDENCE;
AUTHENTICATING
DECLARATION OF JOHNNY
SINODIS**

Judge: Hon. Jeffrey White
Hearing Date: Aug. 22, 2025
Hearing Time: 9:00 a.m.

17
18 W.B.,

19 Plaintiff,

20 v.

21
22 Kristi NOEM, in her official capacity,
23 Secretary of the U.S. Department of Homeland
24 Security, et al.

25 Defendants.

Case No. 4:25-cv-03407-JSW

**NOTICE OF ADDITIONAL
EVIDENCE;
AUTHENTICATING
DECLARATION OF JOHNNY
SINODIS**

Judge: Hon. Jeffrey White
Hearing Date: Aug. 22, 2025
Hearing Time: 9:00 a.m.

1 I, Johnny Sinodis, do hereby declare:

2 1. I am a partner at Van Der Hout LLP at 360 Post Street, Suite 800, San Francisco,
3 CA 94108. I have personal knowledge of the matters stated herein because I am an attorney for
4 Plaintiff John Doe in these proceedings. I file this declaration to provide the Court with two pieces
5 of additional evidence in support of Plaintiffs' Opposition to Defendants' Motion for Stay Pending
6 Appeal.

7 2. First, attached at Exhibit A is a declaration of Lorena C. Castillo, along with a
8 redacted Notice to Appear of her client, Mr. D. In the declaration, she explains that the U.S.
9 Department of State revoked her client's P-1 nonimmigrant visa and that, as a result of the visa
10 revocation, the U.S. Department of Homeland Security placed him into removal proceedings under
11 the theory that the revocation of his visa means that he is now out of status in the United States.

12 3. Second, attached as Exhibit B is an article from AP News stating that the Trump
13 administration intends to review the visas of fifty-five million noncitizens for bases to revoke them
14 and that, upon any revocation, they will be placed into removal proceedings.

15 /s/ Johnny Sinodis
16 Johnny Sinodis
17 Declarant
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EXHIBIT A

DECLARATION OF LORENA C. CASTILLO

I, Lorena C. Castillo, hereby declare as follows:

1. My name is Lorena C. Castillo
2. I am over eighteen years of age and am competent to testify regarding the matters described below.
3. I have been a licensed attorney since May 2023, and I am currently licensed, and in good standing, in California. I have also been employed as an immigration attorney with Van Der Hout, LLP, in San Francisco, California, for the past two years.
4. I have been very recently hired to represent a detained client, Mr. D., who is currently detained in Texas. My knowledge of the case is based on his current Notice to Appear, general Immigration and Customs Enforcement documents, and my limited conversations with Mr. D.
5. Mr. D. has been in the United States on a P1 visa since November 23, 2024. His P1 visa has an expiration year of 2028. Around late February 2025, Mr. D. was arrested for driving under the influence. On March 21, 2025, Mr. D. received an email from the U.S. consulate in his home country stating that his visa had been revoked. Mr. D. was not convicted of DUI until sometime this summer.
6. On August 20, 2025, agents from the Homeland Security Investigation and Federal Bureau of Investigation detained Mr. D. at his home and transferred him to 630 Sansome Street, San Francisco, CA 94111, where he was served with a Notice to Appear. In the Notice to Appear, he was charged as removable on the theory that the cancellation of his visa equates to being out of status. He was directly told that he was going to be transferred to Texas. The next morning, Mr. D. was transferred to El Paso, Texas, even though he has zero connections to Texas.

I declare under penalty of perjury that the following is true and correct.

/s/ Lorena C. Castillo
Lorena C. Castillo
Declarant

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: SFR2508000475

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: [REDACTED] currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☐ You are an alien present in the United States who has not been admitted or paroled.
- ☒ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of INDIA and a citizen of INDIA;
3. You were admitted to the United States at SAN FRANCISCO, CA on or about November 23, 2024 as a nonimmigrant Athlete Or Entertainer (P1) with authorization to remain in the United States for a temporary period not to exceed March 22, 2025;
4. Your nonimmigrant Athlete Or Entertainer (P1) visa was revoked on March 21, 2025 under section 221(I) of the Immigration and Nationality Act;
See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(1)(B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a)(15) of the Act, you have remained in the United States for a time longer than permitted, in violation of this Act or any other law of the United States.

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an Immigration Judge of the United States Department of Justice at:

8915 MONTANA AVE, EL PASO, TEXAS 79925. EOIR SPC El Paso, TX

(Complete Address of Immigration Court, including Room Number, if any)

on September 10, 2025 at 8:30 am to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

DANIEL E FRIEDMAN

Digitally signed by DANIEL E FRIEDMAN

Date: 2025.08.20 14:14:20 -07'00' (P) 65

(Signature and Title of Issuing Officer)

Date: August 20, 2025

SAN FRANCISCO, CA

(City and State)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on August 20, 2025, in the following manner and in compliance with section 239(a)(1) of the Act.

☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail

☐ Attached is a credible fear worksheet.

☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the ENGLISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

REFUSED to SIGN
(Signature of Respondent if Personally Served)

R3306 GUAN - DO
(Signature and Title of officer)

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

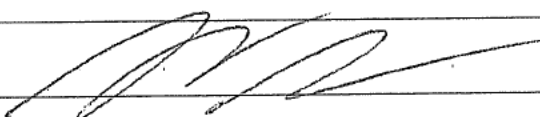
For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

U.S. Department of Homeland Security

Continuation Page for Form I-862

Alien's Name [REDACTED]	File Number [REDACTED] Event No: SFR2508000475	Date 08/20/2025
THE SERVICE ALLEGES THAT YOU: -----		
5. You remained in the United States beyond March 22, 2025 without authorization from the Immigration and Naturalization Service or its successor the Department of Homeland Security.		
Signature 		Title D.O.

4 of 4 Pages

EXHIBIT B

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POLITICS

Trump administration is reviewing all 55 million foreigners with US visas for any violations



BY MATTHEW LEE

Villanova University **LIVE:** Trump administration California redistricting vote Brent Hinds dies US home sales

WASHINGTON (AP) — The Trump administration said Thursday it is reviewing more than 55 million people who have valid [U.S. visas for any violations](#) that could lead to deportation, part of a growing crackdown on foreigners who are permitted to be in the United States.

In a written answer to a question from The Associated Press, the State Department said all U.S. visa holders, which can include tourists from many countries, are subject to “continuous vetting,” with an eye toward any indication they could be ineligible for [permission to enter or stay in the United States](#).

Should such information be found, [the visa will be revoked](#), and if the visa holder is in the United States, he or she would be subject to deportation.

Since President Donald Trump took office, his administration has focused on [deporting migrants illegally in the United States](#) as well as [holders of student and visitor exchange visas](#). The State Department's new language suggests that the continual vetting process, which officials acknowledge is time-consuming, is far more widespread and could mean even those approved to be in the U.S. could abruptly see those permissions revoked.

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There were 12.8 million green-card holders and 3.6 million people in the U.S. on temporary visas last year, according to the Department of Homeland Security.

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As Trump cracks down on student visas, other countries see opportunity

The 55 million figure suggests that some people subject to review would currently be outside the United States with multiple-entry tourist visas, said Julia Gelatt, associate director of the U.S. immigration policy program at the Migration Policy Institute. She questioned the value of spending resources on people who may never return to the United States.

The State Department said it was looking for indicators of ineligibility, including people staying past the authorized timeframe outlined in a visa, criminal activity, threats to public safety, engaging in any form of terrorist activity or providing support to a terrorist organization.

"We review all available information as part of our vetting, including law enforcement or immigration records or any other information that comes to light after visa issuance indicating a potential ineligibility," the

department said.

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No more worker visas for commercial truck drivers

The U.S. also will stop issuing worker visas for commercial truck drivers, Secretary of State Marco Rubio said Thursday on X. He said the change was effective immediately.

“The increasing number of foreign drivers operating large tractor-trailer trucks on U.S. roads is endangering American lives and undercutting the livelihoods of American truckers,” Rubio posted.

The Trump administration in the past months [has taken steps](#) to enforce the requirement that truckers speak and read English proficiently. The Transportation Department said the aim is to improve road safety following incidents in which drivers’ ability to read signs or speak English [may have contributed](#) to traffic deaths.

The State Department said later Thursday it was pausing the processing of these work visas to review its “screening and vetting protocols.”

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“Ensuring that every driver on our roads meets the highest standards is important to protecting the livelihoods of American truckers and maintaining a secure, resilient supply chain,” the department said.

Edward Alden, senior fellow at the Council on Foreign Relations, said foreign workers have helped address a labor shortage of commercial truck drivers.

“This action should be seen as part of a concerted effort by the administration to discourage American companies and other institutions like universities and hospitals from hiring and retaining foreign workers,” Alden wrote in an email.

“The goal here is not to target specific classes of workers, but to send the message to American employers that they are at risk if they are employing foreign workers. The economic consequences will be far larger than

just visas being stripped from foreign workers in a few job categories.”

New review of all visa holders is a major expansion

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The administration has steadily imposed [more restrictions and requirements on visa applicants](#), including requiring them to submit to in-person interviews. The review of all visa holders appears to be a significant expansion of what had initially been a process focused mainly on [students who have been involved in what the government perceives as pro-Palestinian or anti-Israel activity](#).

Officials say the reviews will include [all visa holders' social media accounts](#), law enforcement and immigration records in their home countries, along with any actionable violations of U.S. law committed while they were in the United States.

The reviews will include new tools for data collection on past, present and future visa applicants, including a [complete scouring of social media sites](#) made possible by new requirements introduced earlier this year. Those make it mandatory for privacy switches on cellphones and other electronic devices or apps to be turned off when an applicant appears for a visa interview.

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“As part of the Trump Administration's commitment to protect U.S. national security and public safety, since Inauguration Day the State Department has revoked more than twice as many visas, including nearly four times as many student visas, as during the same time period last year,” the State Department said.

The vast majority of foreigners seeking to come to the U.S. require visas, especially those who want to study or work for extended periods. Among the exceptions for short-term tourist or business visits are citizens of the 40 mainly European and Asian countries belonging to the Visa Waiver Program, which grants those nationals a stay of up to three months without having to apply for a visa.

But large swaths of the world — including highly populated countries like China, India, Indonesia, Russia and most of Africa — are not part of the program, meaning their citizens must apply for and receive visas to travel

to the United States.

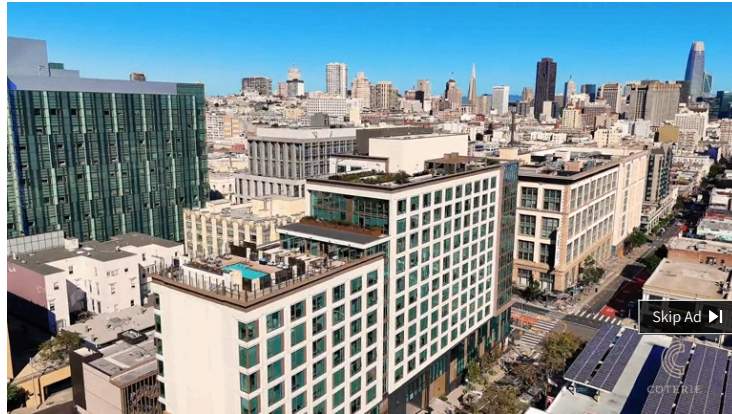
Earlier this week, the department said that since Trump returned to the White House, it has revoked more than 6,000 student visas for overstays and violations of local, state and federal law, the vast majority of which were assault, driving under the influence of alcohol or drugs and support for terrorism.

It said about 4,000 of those 6,000 were due to actual infractions of laws and that approximately 200 to 300 visas were revoked for terrorism-related issues, including providing support for designated terrorist organizations or state sponsors of terrorism.

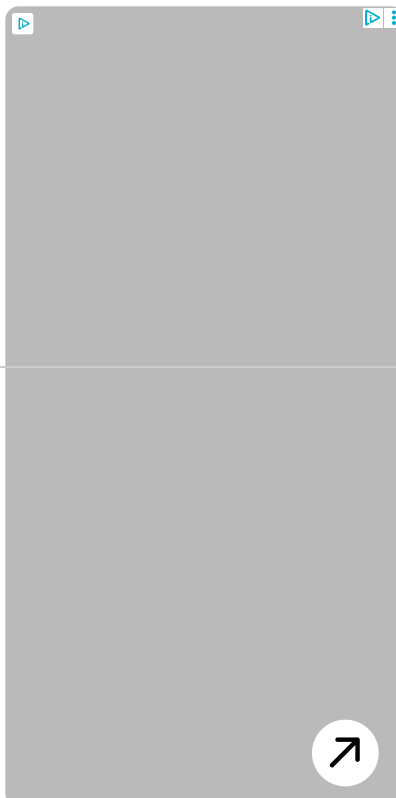
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Elliot Spagat in San Diego contributed.

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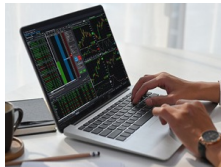
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